## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

MINDY WELFORD,	)
Plaintiff,	) CIVIL ACTION NO.: ) 1:20-cv-151-LG-RPM
v.	)
EQUIFAX INFORMATION SERVICES, LLC, AND PROFESSIONAL	)
COLLECTION SERVICE, INC.	)
Defendants.	) ) )

## DEFENDANT PROFESSIONAL COLLECTION SERVICE, INC'S MOTION FOR SUMMARY JUDGMENT

COMES NOW Professional Collection Service, Inc., the Defendant in the above-captioned matter and, pursuant to Fed. R. Civ. P. 56, moves for summary judgment as to each of the claims raised by Plaintiff, Mindy Welford. This Motion is based upon the pleadings in this matter, Defendant's written discovery requests, Plaintiff's judicial admissions, and the Declaration of H. Richmond Culp, III as well as Plaintiff's apparent abandonment of the case. Accompanying this Motion is a supporting Memorandum of Law, and Defendant's Statement of Uncontested Material Facts.

WHEREFORE, Professional Collection Service, Inc. respectfully asks that this Court issue an Order granting its Motion and to enter judgment in its favor, casting all fees and costs upon Plaintiff.

Respectfully submitted this 30th day of October, 2020.

Professional Collection Service, Inc, Defendant By: <u>/s/ H. Richmond Culp, III</u> H. Richmond Culp, III Mississippi Bar No. 7936 OF COUNSEL:
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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served all parties of record with a copy of the foregoing **Defendant Professional Collection Service**, Inc.'s Motion for Summary Judgment by depositing a copy of same in the United States Mail, with first-class postage affixed thereto, properly addressed as follows:

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This the 30<sup>th</sup> day of October, 2020.

/s/ H. Richmond Culp, III H. RICHMOND CULP, III